

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JOSE GOMEZ FALGAS

Debtor(s)

**CASE NUMBER: 10-10158 ESL**

**CHAPTER 13**

**MOTION REQUESTING THE CONTINUANCE OF THE AUTOMATIC STAY**

**TO THE HONORABLE COURT:**

COMES now Debtor(s) represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

1. The Debtor moves the court to enter an order for continuance of the automatic stay provided under s 362 (a). In support of this motion, the Debtor states as follows:

2. Debtor has one prior bankruptcy and respectfully request the stay be continued in regards with his creditors based on the following circumstances:

a) Debtor had a baby and also some extraordinary expenses due to his daughter's illness as well as a change of job some months ago which caused him to fall in arrears with the Trustee and the case was dismissed.

b) Debtor is fully aware that the bankruptcy is a privilege and he needs a chance to provide he can reorganize his finance by completing with his payment schedule plan. Debtor needs to cure arrears of his only home and that of his family as well as pay for the car with BBVA which is his transportation to work.

**WHEREFORE**, the Debtor respectfully requested from this Honorable Court to continue the automatic stay under Section 362(a) as to all Creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under s 362(c)(1) or (c)(2) or a motion for relief is granted under s 362(d).

**NOTICE:** "Parties in interest are hereby granted fourteen (14) days from the date of this notice to request hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon the filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed the Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejections should be denied."

**I HEREBY CERTIFY:** That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee **José R. Carrión, Esq.**, US Trustee **Monsita Lecaroz Arribas** and I hereby certify that I have mailed by regular mail to all creditors listed on the Master Address List.

In San Juan, Puerto Rico, this 1<sup>st</sup>, day of November, 2010.

**RESPECTFULLY SUBMITTED.**

**/s/ Marilyn Valdes Ortega**  
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